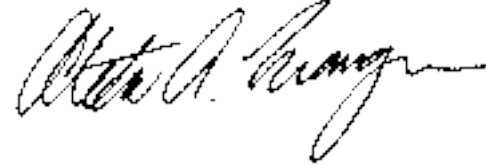


UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION



SOUTHERN ELECTRICAL RETIREMENT FUND,)	
)	
)	Civil Action No. 3:14-cv-1076
Plaintiff,)	
)	<i>Judge Trauger</i>
v.)	<i>Magistrate Judge Brown</i>
)	
J.H. HAYNES ELECTRIC COMPANY, INC.)	
d/b/a HAYNES ELECTRIC COMPANY,)	
)	
Defendant.)	

**MOTION FOR PRELIMINARY INJUNCTION
AND TO WAIVE SECURITY**

Pursuant to Fed. R. Civ. P. 65(a) and (c), Plaintiff moves the Court to enter a preliminary injunction and to waive any requirement for security in connection with issuance of the interlocutory injunction.

The injunction would require the Defendant to submit reports and payments required under a collective bargaining agreement. Without these reports and payments, Defendant's employees may be deprived of benefits, and so absent injunctive relief Plaintiff and member employees may suffer irreparable harm. A supporting and explanatory memorandum is filed herewith.

Plaintiff requests the Court to note similar injunctive relief was granted in Civil Action No. 3:13-1428 (Docket Entry no. 12), copy attached.

Respectfully submitted,

s/R. Jan Jennings
R. Jan Jennings, BPR No. 1536
Branstetter, Stranch & Jennings, PLLC
227 Second Avenue North, 4th Floor
Nashville, TN 37201-1631
Tel. (615) 254-8801
Email: jan@branstetterlaw.com